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Statement to California State Land Commission on October 16, 2007

Subject: PRC 421 Recommissioning Project
Comments on the Draft EIR

I'm Connie Hannah, speaking for the Santa Barbara League of Women Voters. The League has been following various oil projects on the South Coast since the 1980's. At the insistence of the public, most of the projects developed since then have been well planned, using the best available technology. Some of them have even become international models for oil facilities. The project that Venoco bought with these piers and the Ellwood Marine Terminal was developed first in the 1920's, and these facilities were built using the technology of that era. As a result, they have presented many problems to the community over the long historical span.

For several years the League and many other community organizations have been asking for the abandonment of the Ellwood Marine Terminal and related facilities. Piers 421-1 and 421-2 are two of those, and we think that this DEIR clearly shows why they should remain closed down, because of their location in the tidal zone. The EMT and the barging operation have all kinds of negatives associated with them, and will be discussed at a future hearing.

The League thinks that this Draft EIR covers most of our concerns. Piers 421-1 and 2 have been shut down for so long, and will require so much rebuilding that they should be seen as new development, and thus should not be permitted for this non-conforming project. No one would agree to locate a new oil drilling project in this shoreline location, and so this new project should not be approved. These deteriorating structures should be removed as soon as possible. The No Project Alternative with pressurization may be needed to do this.

The large number of Class I impacts that cannot be mitigated are enough to deny this permit. Many of the Class II impacts could also present major problems even with the suggested mitigations. The threat of earthquake or tsunami on this shoreline cannot be really provided for. Because of the age of all this equipment, and the eroding area in which it is located, all of the Class I impacts are much more likely to occur than they would in a modern project that had used best available technology when it was built.

The special value of all the biological resources in this area, which UCSB uses for research, should require abandonment of these wells. We have had enough grim local experience to learn that clean-up of accidental oil spills is usually ineffective, and the resources are lost for an indeterminate length of time. The No Project Alternative is clearly much safer. Extraordinary amounts of monitoring will be required if any recommissioning is approved. The DEIR indicates that the main choice should be between the No Project Alternative and the No Project with Pressure Testing.